



OFFICE OF THE  
CHIEF FINANCIAL  
OFFICER

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 23, 2025

Mr. Marcus Nichol  
Executive Director, New Nuclear  
Nuclear Energy Institute  
1201 F Street NW, Suite 1100  
Washington, DC 20004

SUBJECT: RESPONSE TO THE NUCLEAR ENERGY INSTITUTE'S REQUEST FOR A  
FEE EXEMPTION FOR NEI 22-04, REVISION 0 "UTILIZATION OF ISO 9001  
AND OTHER NON-NUCLEAR SUPPLIERS FOR SAFETY-RELATED  
APPLICATIONS"

Dear Mr. Nichol:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated May 22, 2025, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25150A398), requesting a fee exemption under Title 10 of the *Code of Federal Regulations* (10 CFR) 170.11(a)(1)(ii) for the NRC's review and endorsement of NEI 22-04, "Utilization of ISO 9001 and Other Non-nuclear Suppliers for Safety-related Applications," Revision 0, and all associated review activities, including meetings and supplemental submittals. Based on the following analysis, I am granting your request for a fee exemption under 10 CFR 170.11(a)(1)(ii) for the NRC's review of NEI 22-04, Revision 0. This fee exemption is only applicable to Revision 0 and does not apply to the NRC's review of any future submissions of NEI 22-04.

The NRC has established regulations for the granting of fee exemptions under 10 CFR 170.11 "Exemptions." An interested person may apply for an exemption under 10 CFR 170.11 in accordance with 10 CFR 170.5, "Communications."<sup>1</sup> The NRC staff reviewed your request based on the regulations in 10 CFR 170.11(a)(1)(ii) and 10 CFR 170.11(d).

Section 170.11(a)(1)(ii) states:

No application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for: (1) A special project that is a request/report submitted to the NRC— . . . (ii) When the NRC, at the time the request/report is submitted, plans to use the information to assist the NRC in generic regulatory improvements or efforts (e.g., rules, regulatory guides, regulations, policy statements, generic letters, or bulletins).

CONTACT: Billy Blaney, OCFO/DOB  
301-415-5092

---

<sup>1</sup> 10 CFR 170.5 provides that "All communications concerning the regulations in this part should be addressed to the NRC's Chief Financial Officer, either by mail to the U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; by hand delivery to the NRC's offices at 11555 Rockville Pike, Rockville, Maryland; or, where practicable, by electronic submission, for example, via Electronic Information Exchange, or CD-ROM."

Section 170.11(d) states:

All fee exemption requests must be submitted in writing to the Chief Financial Officer in accordance with § 170.5, and the Chief Financial Officer will grant or deny such requests in writing.

In your letter, you noted that as the demand for advanced reactors uprates to the existing fleet, and potential plant restarts continue to grow, the industry faces a critical shortage of ASME NQA-1 qualified suppliers. You further stated that NEI 22-04, Revision 0, would support generic regulatory improvements by enabling consistent application of NRC's quality assurance requirements for a broader supplier base and will aid the NRC's efforts to build a robust, future-ready regulatory framework for advanced reactor deployment.

The NRC staff reviewed the fee exemption request and agreed that NEI 22-04, Revision 0, if endorsed, would assist the NRC in a generic regulatory improvement by allowing for a new process that may enable nuclear supply chain expansion for NRC licensees. Specifically, if endorsed, NEI 22-04, Revision 0, would allow industry to use this new process to enable suppliers with commercial quality programs to meet the requirements of 10 CFR Part 50, Appendix B, thereby expanding the nuclear supply chain and allowing licensees to procure safety related structures, systems, and components using alternative methods. Expansion of the nuclear supply chain could address challenges that NRC licensees are facing in procuring safety related structures, systems, and components.

Therefore, I am granting your request for a fee exemption under 10 CFR 170.11(a)(1)(ii) for the NRC's review of NEI 22-04, Revision 0, because this revision will assist the NRC with generic regulatory improvements or efforts. This approval is not applicable to any future revisions of NEI 22-04. If NEI submits future revisions for review, NEI may submit a fee exemption request for the endorsement review at that time. Consistent with its regulations, the NRC will evaluate a fee exemption request for NRC review of a document at the time such document is submitted to NRC for review.

If you have any technical questions regarding this matter, please contact Andrea Keim at 301-415-1671. Please contact Billy Blaney, of my staff, at 301-415-5092 for any fee-related questions.

Sincerely,



Signed by Carroll, Christopher  
on 07/23/25

Chris D. Carroll  
Acting Chief Financial Officer

SUBJECT: RESPONSE TO THE NUCLEAR ENERGY INSTITUTE'S REQUEST FOR A FEE EXEMPTION FOR NEI 22-04, REVISION 0 "UTILIZATION OF ISO 9001 AND OTHER NON-NUCLEAR SUPPLIERS FOR SAFETY-RELATED APPLICATIONS", DATED: JULY 23, 2025

**DISTRIBUTION: OCFO-25-00087**

RidsNsirOd Resource  
NAridi, OCFO  
MVelasquez, OCFO  
NOtto, NRR

**EXTERNAL DISTRIBUTION:**

[mrn@nei.org](mailto:mrn@nei.org)

**ADAMS Accession Number: ML25188A074 Package; ML25188A075 Letter**

|        |                   |                   |                         |            |
|--------|-------------------|-------------------|-------------------------|------------|
| OFFICE | OCFO/DOB          | OCFO/DOB          | NRR/DRO                 | NRR/DORL   |
| NAME   | BBlaney           | CGalster          | KKavanagh               | JRankin    |
| DATE   | 07/07/2025        | 07/07/2025        | 07/07/2025              | 07/07/2025 |
| OFFICE | NRR/DRO           | NRR/DORL          | OGC                     | OCFO/DOC   |
| NAME   | PMcKenna          | ARivera-Varona    | CMcCann <sup>*NLO</sup> | RMorton    |
| DATE   | 07/08/2025        | 07/07/2025        | 07/14/2025              | 07/15/2025 |
| OFFICE | OCFO/DOC          | OCFO/DOB          | OCFO/DOB                | OCFO/DOB   |
| NAME   | MBlair            | JAreas            | LYee                    | MNeville   |
| DATE   | 07/15/2025        | 07/15/2025        | 07/18/2025              | 07/17/2025 |
| OFFICE | CFO               | CFO               |                         |            |
| NAME   | DD'Abate (Acting) | CCarroll (Acting) |                         |            |
| DATE   | 07/21/2025        | 07/23/2025        |                         |            |

**OFFICIAL RECORD COPY**